NOT FOR DISTRIBUTION IN OR INTO THE UNITED STATES, EUROPEAN ECONOMIC AREA, CANADA, JAPAN OR AUSTRALIA

(Constituted in the Republic of Singapore pursuant to a Trust Deed dated 5 July 2004 (as amended))

ANNOUNCEMENT

NOTICE OF CUMULATIVE DISTRIBUTION BOOKS CLOSURE DATE AND DISTRIBUTION PAYMENT DATE

Capitalised terms used herein, but not otherwise defined, shall have the meanings ascribed to them in the announcement of Mapletree Logistics Trust dated 22 October 2019 titled "Launch of Private Placement to Raise Gross Proceeds of Approximately S\$250.0 million" (the "Launch Announcement").

NOTICE IS HEREBY GIVEN that, pursuant to the Private Placement (as defined herein), the Transfer Books and Register of Unitholders of Mapletree Logistics Trust ("**MLT**") will be closed at **5.00 p.m.** on **31 October 2019** (the "Books Closure Date") for the purpose of determining the entitlement of MLT's unitholders (the "**Unitholders**") to MLT's distributable income (the "**Cumulative Distribution**") comprising (i) the distribution of 2.025 cents per Unit for the period from 1 July 2019 to 30 September 2019; and (ii) a distribution of approximately between 0.670 cents and 0.690 cents per Unit for the period from 1 October 2019 to the day immediately prior to the date on which the new units in MLT ("**New Units**") are issued in connection with the placement of New Units to eligible institutional, accredited and other investors (the "**Private Placement**"). The New Units pursuant to the Private Placement are expected to be listed on 1 November 2019.

Unitholders whose securities accounts with The Central Depository (Pte) Limited are credited with units in MLT ("**Units**") as at 5.00 p.m. on the Books Closure Date will be entitled to the Cumulative Distribution that will be paid on or around **Friday**, **6 December 2019**.

The Cumulative Distribution is intended to ensure that the distributable income accrued by MLT up to the day immediately preceding the date of issue of the New Units (which at this point, will be entirely attributable to Units in issue immediately prior to the issue of the New Units under the Private Placement (the "**Existing Units**")) is only distributed in respect of the Existing Units, and is being proposed as a means to ensure fairness to holders of the Existing Units. The next distribution following the Cumulative Distribution will comprise MLT's distributable income for the period from the day the New Units are issued under the Private Placement to 31 December 2019. Quarterly distributions will resume thereafter, unless otherwise announced.

The quantum of Cumulative Distribution per Existing Unit for the period from 1 July 2019 to the date immediately prior to the date on which the New Units are issued pursuant to the Private Placement

is currently estimated to be approximately between 2.695 cents and 2.715 cents¹.

The actual quantum of the distribution per Unit under the Cumulative Distribution (which may differ from the estimate above) will be announced on a later date.

For the avoidance of doubt, the holders of the New Units to be issued pursuant to the Private Placement will not be entitled to the Cumulative Distribution.

Declaration for Singapore Tax Purposes

- 1. The tax-exempt income component of the distribution is exempt from tax in the hands of all Unitholders. No tax will be deducted at source from this component.
- 2. The other gains component of the distribution is not taxable in the hands of all Unitholders.
- 3. The capital component of the distribution is treated as a return of capital for Singapore income tax purposes. No tax will be deducted at source from this component.
- 4. Tax will be deducted at source from the taxable income component in certain circumstances. The following paragraphs describe the circumstances in which tax will or will not be deducted from the taxable income component of the distribution.
- 5. The following categories of Unitholders will receive a gross distribution (i.e. no tax will be deducted from it):
 - a. Unitholders who are individuals and who hold the Units either in their sole names or jointly with other individuals;
 - b. Unitholders which are companies incorporated and tax resident in Singapore;
 - c. Unitholders which are Singapore branches of companies incorporated outside Singapore;
 - d. Unitholders which are body of persons (excluding companies or partnerships) incorporated or registered in Singapore;
 - e. Unitholders which are international organisations that are exempt from tax on such distributions by reason of an order made under the International Organisations (Immunities and Privileges) Act (Cap. 145); and
 - f. Unitholders which are real estate investment trust exchange-traded funds which have been accorded the tax transparency treatment.
- To receive a gross distribution, Unitholders in categories (b) to (f) under Paragraph 5 above must complete a prescribed form – the "Declaration for Singapore Tax Purposes Form" ("Form A").
- 7. These categories of Unitholders, unless they are exempt from tax because of their own circumstances, will have to pay income tax subsequently at their own applicable tax rates.
- 8. Unitholders in category (a) are not required to submit any form. The gross distribution received by these Unitholders (irrespective of their tax residence status) is exempt from tax

¹ This amount is an estimate only based on information currently available to the Manager and the Manager's estimate of MLT's revenue and expenses for the relevant period on a pro-rata basis and the actual Cumulative Distribution may differ.

if it is not derived through a partnership in Singapore or from the carrying on of a trade, business or profession.

- 9. Tax at the reduced rate of 10% will be deducted from the distribution made to Unitholders which are:
 - a. foreign non-individual; and
 - b. qualifying non-resident fund.
- 10. A foreign non-individual is one (other than an individual) who is not a resident of Singapore for income tax purposes and:
 - a. who does not have a permanent establishment in Singapore; or
 - b. who carries on any operation in Singapore through a permanent establishment in Singapore, where the funds used to acquire the Units in MLT are not obtained from that operation.
- A qualifying non-resident fund is one that qualifies for tax exemption under section 13CA,
 13X or 13Y of the Income Tax Act that is not a resident of Singapore for income tax purposes and:
 - a. does not have a permanent establishment in Singapore (other than a fund manager in Singapore); or
 - b. carries on any operation in Singapore through a permanent establishment in Singapore (other than a fund manager in Singapore), where the funds used to acquire the Units in MLT are not obtained from that operation.

For this purpose, a non-resident fund refers to a fund being a non-resident company, a partnership where all partners are non-residents, a trust administered by a non-resident trustee, or a non-resident entity.

- 12. To receive the distribution net of tax deducted at 10%, Unitholders in categories (a) and (b) under Paragraph 9 above are required to complete Form A.
- 13. Beneficial owners of Units in MLT who hold their Units through depository agents will receive:
 - a. gross distribution if they are persons described in categories (a) to (f) under Paragraph 5 above; and
 - b. distribution net of tax deducted at 10% if they are Unitholders described in categories (a) and (b) under Paragraph 9 above.
- 14. To receive gross distribution and distribution net of tax deducted at 10%, depository agents are required to complete the "Declaration by Depository Agents for Singapore Tax Purposes Form" ("**Form B**") and its annexes.
- 15. Form A and Form B (and its annexes) will be sent to Unitholders and depository agents respectively, by MLT's unit registrar (the "Unit Registrar"), Boardroom Corporate & Advisory Services Pte. Ltd. located at 50 Raffles Place #32-01 Singapore Land Tower, Singapore 048623, on or around Thursday, 7 November 2019.

- 16. Unitholders (Form A) and the depository agents (Form B and its annexes) will have to complete the forms legibly and send it to the Unit Registrar such that they are received by 5.00 pm on Thursday, 21 November 2019. Failure to comply with any of these requirements will render Form A and Form B invalid and the trustee and the Manager of MLT will be obliged to deduct tax at the rate of 17% from the distribution.
- 17. Unitholders who hold Units under the Central Provident Fund Investment Scheme ("**CPFIS**") and the Supplementary Retirement Scheme ("**SRS**") do not have to return any form. They will receive gross distribution.

Important Reminder

Unitholders and depository agents must complete and return the "*Declaration for Singapore Tax Purposes Form A and Form B (and its annexes)*", respectively to the Unit Registrar's office by **5.00 p.m.** on **Thursday, 21 November 2019** in order to receive the distribution either at gross or at net (after deduction of tax at 10%) as described above.

Declaration in Income Tax Return

This distribution is considered as income for the year 2020. Beneficial owners of the distribution, other than those who are exempt from tax on the distribution or who are entitled to the reduced tax rate of 10%, are required to declare the gross amount of the taxable income component of the distribution (regardless whether the distribution is paid in cash or in the form of units) as taxable income in their Singapore income tax return for the year of assessment 2021.

Date / Deadline	Event
9.00 a.m., Wednesday, 30 October 2019	First day of "ex-distribution" trading
5.00 p.m., Thursday, 31 October 2019	Closure of MLT's Transfer Books and Register of
	Unitholders for the Cumulative Distribution
Thursday, 7 November 2019	Despatch of Form A and Form B
5.00 p.m., Thursday, 21 November 2019	Unitholders and depository agents must have completed and returned Form A or Form B, as applicable, to the Unit Registrar, Boardroom Corporate & Advisory Services Pte. Ltd., located at 50 Raffles Place #32-01 Singapore Land Tower, Singapore 048623.
On or around Friday, 6 December 2019	Payment of Cumulative Distribution to Unitholders' securities accounts.

Important Dates And Times

The above timetable may be subject to change. In the event that the above timetable is modified,

the Manager will make a separate SGXNET announcement.

Should Unitholders have any queries in relation to these procedures, please do not hesitate to contact:

Ms Lum Yuen May Director, Investor Relations Tel : +65 6659 3671 Email : <u>lum.yuenmay@mapletree.com.sg</u> Or visit MLT's website at <u>www.mapletreelogisticstrust.com</u>

By Order of the Board

Wan Kwong Weng Joint Company Secretary Mapletree Logistics Trust Management Ltd. (Company Registration No. 200500947N) As Manager of Mapletree Logistics Trust

22 October 2019

IMPORTANT NOTICE

This announcement is not for distribution, directly or indirectly, in or into the United States and is not an offer of securities for sale in the United States or any other jurisdictions.

The value of units in MLT ("**Units**") and the income derived from them may fall as well as rise. Units are not obligations of, deposits in, or guaranteed by, the Manager, or any of its affiliates. An investment in Units is subject to investment risks, including the possible loss of the principal amount invested.

Investors have no right to request the Manager to redeem their Units while the Units are listed. It is intended that Unitholders of MLT may only deal in their Units through trading on Singapore Exchange Securities Trading Limited (the "**SGX-ST**"). Listing of the Units on the SGX-ST does not guarantee a liquid market for the Units.

This announcement is for information only and does not constitute an invitation or offer to acquire, purchase or subscribe for Units in the United States or in any other jurisdiction.

The past performance of MLT is not necessarily indicative of the future performance of MLT.

This announcement may contain forward-looking statements that involve risks and uncertainties. Actual future performance, outcomes and results may differ materially from those expressed in forward-looking statements as a result of a number of risks, uncertainties and assumptions. Representative examples of these factors include (without limitation) general industry and economic conditions, interest rate trends, cost of capital and capital availability, competition from similar developments, shifts in expected levels of property rental income, changes in operating expenses (including employee wages, benefits and training costs), property expenses and governmental and public policy changes. Investors are cautioned not to place undue reliance on these forward-looking statements, which are based on the Manager's view of future events.

This announcement is not for release, publication or distribution, directly or indirectly, in or into the United States, European Economic Area, Canada, Japan or Australia, and should not be distributed, forwarded to or transmitted in or into any jurisdiction where to do so might constitute a violation of applicable securities laws or regulations.

The securities referred to herein have not been and will not be registered under the Securities Act, and may not be offered or sold in the United States except pursuant to an applicable exemption from, or in a transaction not subject to, the registration requirements under the Securities Act and in compliance with any applicable state securities laws. Any public offering of securities to be made in the United States would be made by means of a prospectus that may be obtained from an issuer and would contain detailed information about such issuer and the management, as well as financial statements. There will be no public offering of the securities referred to herein in the United States.

Notification under Section 309B of the Securities and Futures Act, Chapter 289 of Singapore

The New Units are prescribed capital markets products (as defined in the Securities and Futures (Capital Markets Products) Regulations 2018) and Excluded Investment Products (as defined in MAS Notice SFA 04-N12: Notice on the Sale of Investment Products and MAS Notice FAA-N16: Notice on Recommendations on Investment Products).